

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HYDRO-PHOTON, INC.,
a Maine Corporation

Plaintiff,

v.

MERIDIAN DESIGN, INC., a California
Corporation

Defendant.

Civil Action No. 05-11240 GAO

**[PROPOSED]
STIPULATED PROTECTIVE ORDER**

WHEREAS certain information, documents and things subject to discovery in this action may be claimed to be highly sensitive or contain a trade secret or other confidential research, development, strategy, marketing, sales, business or commercial information (“Confidential Information” and/or “Highly Confidential Information” as defined in paragraph 3 below);

WHEREAS it has been agreed by and among Plaintiff Hydro-Photon, Inc. (“Hydro-Photon”) and Defendant Meridian Design, Inc. (“Meridian”), through their respective counsel, that a Stipulated Protective Order preserving the confidentiality of certain documents and information should be entered by the United States District Court for the District of Massachusetts; and

WHEREAS the Court has reviewed the terms and conditions of the Stipulated Protective Order submitted by the parties;

IT IS HEREBY STIPULATED AND ORDERED:

1. Scope. This Stipulated Protective Order shall apply to all information, documents and things subject to discovery and provided in connection with the above-identified action, including without limitation, testimony adduced at depositions upon oral examination or upon